

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

**HARRY L. GOODRICH
and AGNES P. GOODRICH**

DOCUMENT FILED ELECTRONICALLY

Plaintiffs,

v.

CIVIL ACTION NO.: 4:17-cv-00009

JOHN CRANE, INC.

**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT ON
JOHN CRANE INC.'S SOPHISTICATED PURCHASER, GOVERNMENT
CONTRACTOR, AND INTERVENING NEGLIGENCE/SUPERSEDING CAUSE
DEFENSES PURSUANT TO FRCP 56**

NOW COME Plaintiffs, by counsel, and move this Court for partial summary judgment on John Crane Inc.'s Sophisticated Purchaser, Government Contractor, and Intervening Negligence/Superseding Cause Defenses pursuant to Federal Rule of Procedure 56. In support of this Motion, Plaintiffs refer this Court to Plaintiffs' Memorandum in Support of Motion For Partial Summary Judgment On John Crane Inc.'s Government Contractor, Sophisticated Purchaser, and Intervening Negligence/Superseding Cause Defenses Pursuant To Federal Rule Of Civil Procedure 56, filed this day.

Respectfully submitted,

By: /s/ William W.C. Harty
Counsel for Plaintiffs

William W.C. Harty, Esq. (VSB # 45447)
Robert R. Hatten, Esq. (VSB # 12854)
Hugh B. McCormick, III, Esq. (VSB # 37513)
Erin E. Jewell, Esq. (VSB # 71082)
F. Alex Coletrane, Esq. (VSB # 78381)
PATTEN, WORNOM, HATTEN & DIAMONSTEIN, L.C.
12350 Jefferson Avenue - Suite 300
Newport News, VA 23602
(757) 223-4500 Telephone

(757) 249-3242 Facsimile
wharty@pwhd.com

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of October, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Eric G. Reeves, Esq. Martin A. Conn, Esq. Brian J. Schneider, Esq. MORAN, REEVES & CONN, P.C. 100 Shockoe Slip, 4th Floor Richmond, VA 23219	<i>Counsel for John Crane, Inc.</i>
--	-------------------------------------

By: /s/ William W.C. Harty
Counsel for Plaintiffs